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7
 8 **UNITED STATES DISTRICT COURT**

9
 10 **DISTRICT OF NEVADA**

11 KEVIN MEAGHER on behalf of himself and
 12 REBECCA DAWSON on behalf of
 13 themselves and all other similarly situated
 14 individuals,

15 Plaintiffs,

16 v.
 17 KTC HOLDING COMPANY f/k/a THE
 18 KINGDOM TRUST COMPANY,

19 Defendant.

20 CASE NO. 2:24-cv-01630-CDC-MDC

21 **STIPULATION AND PROPOSED ORDER
 TO EXTEND TIME TO RESPOND TO
 FIRST AMENDED COMPLAINT**

22 **(SECOND REQUEST)**

23 Plaintiffs KEVIN MEAGHER and REBECCA DAWSON, on behalf of themselves
 24 and all other similarly situated individuals (“Plaintiffs”), and Defendant KTC HOLDING
 25 COMPANY, formerly known as THE KINGDOM TRUST COMPANY (“Defendant” and
 26 together with Plaintiffs, the “Parties”), by and through counsel, and pursuant to Local Rules
 27 IA 6-1, LR IA 6-2, and LR 7-1, hereby stipulate and agree as follows:

28 WHEREAS, Plaintiffs filed their First Amended Complaint on November 8, 2024
 (ECF No. 13), making the deadline to respond to the amended complaint November 25,
 2024;

WHEREAS, on November 25, 2024, this Court entered an order granting the
 Parties’ joint stipulation to extend the time to respond to the First Amended Complaint
 (ECF No. 15), making Defendant’s response deadline January 17, 2025.

1 WHEREAS, the Parties are actively engaged in settlement negotiations, and request
 2 additional time to explore potential early resolution of this matter.

3 WHEREAS, the Parties have agreed to an extension of time for Defendant to
 4 respond to the amended complaint, namely, February 21, 2025, to allow the Parties to
 5 continue ongoing settlement discussions;

6 NOW, THEREFORE, in consideration of the foregoing, the Parties hereby
 7 STIPULATE and AGREE that the deadline for Defendant to respond to the amended
 8 complaint is February 21, 2025.

9 The Parties represent this stipulation is made in good faith and not for the purposes
 10 of delay.

11 **IT IS SO STIPULATED.**

12 Dated this 3rd day of January, 2025.

13 /s/ Eric W. Swanis

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 15 **GREENBERG TRAURIG, LLP**
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 19 **MCDONALD HOPKINS LLC**
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 21 Chicago, IL 60654

22 *Counsel for Defendant*

12 Dated this 3rd day of January, 2025.

13 /s/ Kennedy M. Brian

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 15 **LEVERTY & ASSOCIATES LAW,**
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22 *Counsel for Plaintiffs*

23
 24 **IT IS SO ORDERED.**

25
 26 Hon. Maximiliano D. Couvillier III
 27 United States Magistrate Judge
 Date: 1/6/25